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Attorneys for Defendant
YAHOO!, INC. (N/K/A ALTABA, INC.)

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

DROPLETS, INC.,

Plaintiff,

v.

YAHOO!, INC.

Defendant.

Civil Action No. 12-cv-03733-JST

**DECLARATION OF WILLIAM HECTOR
I/S/O DEFENDANTS' MOTION TO
STRIKE DROPLETS, INC.'S THIRD
AMENDED INFRINGEMENT
CONTENTIONS**

Date: January 29, 2020
Time: 2:00 p.m.
Ctrm.: 6, 2nd Floor
Hon. Jon S. Tigar

OATH INC. AND OATH HOLDINGS, INC.

Intervenor-Plaintiffs,

v.

DROPLETS, INC.,

Intervenor-Defendant.

1 I, William A. Hector, declare:

2 1. I am an attorney with Venable LLP in the above-captioned litigation. I make this
3 declaration on personal knowledge and if called as a witness could and would competently testify
4 to the matters stated herein.

5 2. Attached hereto as Exhibit 1 is an excerpt from a true and correct copy of an
6 illustrative portion of Droplets' First Amended Infringement Contentions (charting the '745 patent
7 against the so-called "Add to Shopping Bag" functionality). This chart was served on Nordstrom
8 on May 17, 2013.

9 3. Attached hereto as Exhibit 2 is an excerpt from a true and correct copy of an
10 illustrative portion of Droplets' First Amended Infringement Contentions (charting the '745 patent
11 against the so-called "Search Suggest" functionality). This chart was served on Yahoo on May 17,
12 2013.

13 4. Attached hereto as Exhibit 3 is a true and correct copy of an August 14, 2013, letter
14 from Yahoo to Droplets, referencing an August 6, 2013, meet and confer.

15 5. On March 22, 2019, Droplets served second amended infringement contentions on
16 both Yahoo and Nordstrom.

17 6. Attached hereto as Exhibit 4 is a true and correct copy of a letter Defendants sent to
18 Droplets on April 10, 2019.

19 7. Attached hereto as Exhibit 5 is a true and correct copy of an April 23, 2019, letter
20 to Droplets from Defendants, memorializing an April 22, 2019, meet and confer.

21 8. On May 24, 2019, Defendants were each served with Droplets' Third Amended
22 Infringement Contentions.

23 9. Attached hereto as Exhibit 6 is a true and correct copy of a letter Defendants sent to
24 Droplets on July 1, 2019.

25 10. Having received no response to the July 1 letter, on September 26, 2019,
26 Defendants contacted Droplets to request a meet and confer in the first week of October. The
27 parties met and conferred on October 4, 2019.

28 11. Attached hereto as Exhibit 7 is a true and correct copy of a letter Defendants

1 received from Droplets on October 7, 2019.

2 12. Attached hereto as Exhibit 8 is a true and correct copy of a letter Defendants sent to
3 Droplets on October 23, 2019.

4 13. Attached hereto as Exhibit 9 is a true and correct copy of a letter Droplets sent to
5 Defendants on November 3, 2019.

6 14. Attached hereto as Exhibit 10 is a true and correct copy of a letter Defendants sent
7 to Droplets on November 7, 2019.

8 15. Attached hereto as Exhibit 11 are excerpts from a true and correct copy of excerpts
9 from Droplets' Third Amended Infringement Contentions for Nordstrom.

10 16. Attached hereto as Exhibit 12 are excerpts from a true and correct copy of excerpts
11 from Droplets' Third Amended Infringement Contentions for Yahoo.

12 I declare under penalty of perjury under the laws of the United States of America that the
13 foregoing statements are true and correct. Executed on December 10, 2019, at San Francisco,
14 California.

15
16 /s/ William A. Hector
William A. Hector